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International Alliance of Theatrical Stage Employees  
and Moving Picture Machine Operators of the United  
States and Canada Local 720 Pension Trust*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

NEVADA RESORT ASSOCIATION –  
INTERNATIONAL ALLIANCE OF  
THEATRICAL STAGE EMPLOYEES  
AND MOVING PICTURE MACHINE  
OPERATORS OF THE UNITED STATES  
AND CANADA LOCAL 720 PENSION  
TRUST,

Plaintiff,

vs.

JB VIVA VEGAS, L.P.,

Defendant.

JB VIVA VEGAS, L.P.,

Counterclaimant,

vs.

CASE NO.: 2:19-cv-00499-JAD-DJA

**STIPULATION AND ORDER TO EXTEND  
DEADLINE TO FILE MOTIONS FOR  
SUMMARY JUDGMENT**

**[SECOND REQUEST]**

NEVADA RESORT ASSOCIATION –  
INTERNATIONAL ALLIANCE OF  
THEATRICAL STAGE EMPLOYEES  
AND MOVING PICTURE MACHINE  
OPERATORS OF THE UNITED STATES  
AND CANADA LOCAL 720 PENSION  
TRUST,

Counterdefendant.

Plaintiff Nevada Resort Association-International Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of the United States and Canada Local 720 Pension Trust (the “Trust”) and Defendant JB Viva Vegas, L.P. (“JB”) (collectively “the Parties”) hereby stipulate and request an order extending the deadline from September 10, 2019, to September 20, 2019, to file the parties’ respective motions for summary judgment.

On July 8, 2019, the Parties jointly submitted a proposed scheduling order requesting a special scheduling review. (ECF No. 15.) In their proposed order, the Parties reported that they agreed only dispositive motion briefing was required in this case because this matter is a judicial review of an arbitration award related to a withdrawal liability dispute pursuant to Multiemployer Pension Plan Amendments Act of 1980 (“MPPAA”), and specifically 29 U.S.C. § 1401(b)(2). (*Id.*) On July 11, 2019, this Court granted the Parties’ proposed scheduling order and scheduled dispositive motions to be filed by August 26, 2019. (ECF No. 16.)

On August 15, 2019, the Parties stipulated and filed their first request to extend the dispositive motion deadline. (ECF No. 21.) The Court granted their request, and extended the dispositive motion deadline to be September 10, 2019, with oppositions due October 1, 2019, and replies due October 15, 2019. (ECF No. 22, filed Aug. 19, 2019.)

The Parties now respectfully request a second extension of ten additional days to brief the issues for this Court. MPPAA, the associated withdrawal liability rules and the issues present in this case are notably complex. Both Parties request the extension so to accurately and fully explain the arguments to this Court. The Parties understand this is their second request for a brief extension, but the Parties do not foresee requiring any additional time after September 20, 2019, to complete the briefing.

1 The parties therefore jointly request that the Court approve the following amended  
2 briefing schedule:

3 1. The Parties shall have until Friday, September 20, 2019, to file dispositive  
4 motions.

5 2. The Parties shall have until Friday, October 11, 2019, to file oppositions to  
6 dispositive motions.

7 3. The Parties shall have until Friday, October 25, 2019, to file replies in support of  
8 dispositive motions.

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1 This request is not being brought for the purpose of delay, but to enable the Parties enough  
2 time to properly brief the numerous issues in this matter for this Court.

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4 BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

AKIN GUMP STRAUSS HAUER & FELD,  
LLP

5  
6 /s/ Christopher M. Humes

/s/ Eric Field

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13 *Attorneys for Plaintiffs*

*Attorneys for Defendant*

14  
15 Dated: September 3, 2019.

Dated: September 3, 2019.

16  
17 **ORDER**

18 **IT IS SO ORDERED.**

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21 Daniel J. Albregts  
22 United States Magistrate Judge

23 Dated: September 4, 2019

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